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9 **SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION**

10 In the matter of:

11 VIOLATION REPORT/COMPLAINT FOR THE  
12 IMPOSITION OF ADMINISTRATIVE CIVIL  
PENALTIES, ENFORCEMENT FILE NO.  
13 ER2013.009 AND PERMIT FILE NOS.  
14 1985.019.22A, 1985.019.09B; SCOTT'S JACK  
LONDON SEAFOOD, INC. AND THE PORT OF  
OAKLAND

**DECLARATION OF SANDRÉ SWANSON**

1 I, Sandré Swanson, declare:

2 1. I have personal knowledge of the following facts and if called as a witness, could, and would,  
3 competently testify thereto.

4 2. During my 40 years of public service, I have known Scott's and the Gallagher family in a  
5 variety of different capacities. Scott's has consistently contributed to non-profits in the East Bay and  
6 provided a wonderful place of employment for people in the area.

7 3. When I served as Chief of Staff for Congresswoman Barbara Lee, I attended numerous events  
8 on her behalf with community members in support of charitable work that were held at the pavilion at  
9 Jack London Square. The pavilion was necessary because there have not been adequate facilities on the  
10 waterfront to house these kinds of events. Scott's charitable work has given events of this kind a home.

11 4. I also served as Deputy Mayor of Oakland and during that time, we called upon Scott's to assist  
12 us with a number of events, including the Summer Youth Jobs Program for inner-city youth. Scott's  
13 was very supportive of that program. Scott's has donated money and facilitated the mentoring of youth  
14 in the program.

15 5. When I was a member of the State Assembly representing Oakland from 2006 to 2012, I  
16 attended numerous events that Scott's hosted for charities at the pavilion. These included Governor  
17 Brown's Oakland Military Institute, community charities that dealt with scholarship opportunities for  
18 youth, and religious community events raising funds for at-risk youth. Through their generosity, Scott's  
19 provides opportunities for these organizations to gain exposure that they would not have had if they  
20 could not use the pavilion. Without the pavilion, they certainly would not have brought so many people  
21 down to the waterfront and received the exposure and attention that come with such a high-profile and  
22 beautiful location.

23 6. I have a foundation, the Sandré R. Swanson Youth Foundation, which concentrates on at-risk  
24 youth in the area and provides them with resources to succeed. We support a number of network  
25 organizations, like East Oakland Youth Development Center and the Oakland Mentoring Group. We are  
26 also part of President Obama's "My Brother's Keeper" initiative, which helps provide opportunities for  
27 boys and young men of color. Scott's has made direct donations to the events that have helped with  
28 outreach and mentoring activities and promotion of these programs.

1 7. We have held two events at the pavilion, both of which were extremely successful at spreading  
2 awareness and fundraising for our programs. Scott's waived the rental cost for both of our events, and  
3 donated food and drinks for one of our events. Their generosity greatly reduced the overhead costs of  
4 the events and enabled us to have a successful fundraising campaign.

5 8. If we could not host events at the pavilion, it would make fundraising and organizing a lot more  
6 difficult for my foundation and other organizations, which would result in fewer services being  
7 provided for young people. There are not many facilities in Jack London Square on the waterfront that  
8 provide these types of charitable services. Generally in the East Bay, it's difficult to find businesses  
9 that are willing to donate resources so broadly to help organizations succeed, which Scott's has been  
10 doing with the pavilion for years. I feel confident saying that they are one of the leading providers of  
11 this type of philanthropy and charitable contributions in the area, and the pavilion has been a  
12 tremendous asset to providing that type of support.

13 9. In addition, Ray Gallagher has also encouraged his peers to contribute to causes that he has been  
14 involved with. For example, Scott's hosts an annual youth boxing exposition at the pavilion, and Scott's  
15 invites other organizations to attend and participate, which results in more exposure and outreach for  
16 everybody. Support like this is a tremendous value to my non-profit and others.

17 10. I hope that the commission can see the positive work that Scott's and the Gallagher family have  
18 done for the community over the years. Scott's use of the pavilion has been crucial for charitable  
19 organizations in the area, and to lose them as a resource would have a devastating effect on  
20 philanthropic work throughout the East Bay.

21  
22 I declare under penalty of perjury that the foregoing is true and correct and that this declaration was  
23 executed on this 21 day of January, 2017, at Alameda, California.

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25   
26 Sandré Swanson  
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